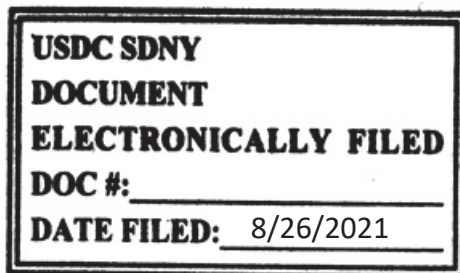


RYAN SESTACK
RSESTACK@GRSM.COM

JEFFREY CAMHI
JCAMHI@GRSM.COM

CHRISTOPHER COYNE
CCOYNE@GRSM.COM



GORDON & REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA, 28TH FLOOR
NEW YORK, NY 10004
WWW.GRSM.COM

August 25, 2021

VIA ECF

Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. SO ORDERED.

Dated: August 26, 2021

Re: *Kairam v. West Side GI, LLC*
Civil Action Number 1:18-cv-1005 (AT) (SDA)

Dear Judge Aaron:

I am an attorney with Gordon Rees Scully Mansukhani, LLP, counsel for defendants WestSide GI, LLC (“WSGI”), Peter Distler, and Ricardo Pou, in the above-referenced consolidated action. Defendants write to respectfully request a 2-week extension of time, from August 30, to September 13, 2021, to file their response to the Consolidated Complaint, filed July 15, 2021 (Docket No. 161). This is the second request for an extension of time to respond to the Consolidated Complaint. Defendants requested plaintiff’s consent to this extension, and plaintiff indicated that she neither consents nor objects to this request.

Defendants request this extension of time in order to complete their analysis of the Consolidated Complaint and finalize their response to this pleading. The Consolidated Complaint is 53-pages long, with 220 paragraphs and 28 separate and distinct causes of action. Moreover, and as the Court is aware, many of these claims have been subject to extensive motion practice, including an appeal to the Second Circuit and remand to the district court. This case entails an extremely complicated procedural history associated with the three separate matters that existed prior to consolidation, and thus requires a significant amount of time to review, analyze, and develop a response. In addition, the undersigned has had numerous deadlines in other matters over the past few weeks, including, among other things, imminent motion deadlines in proceedings before the New York State Supreme Court, Bronx County, and United States District Court, Eastern District of New York. Given the complexity of this matter and these separate obligations in other matters, Defendants are compelled to request this brief 2-week extension of time.

As such, Defendants respectfully request this extension of time, until September 13, 2021,

to respond to the Consolidated Complaint.

Thank you for your consideration of this matter.

Respectfully submitted,

GORDON REES SCULLY
MANSUKHANI, LLP

Christopher Coyne

Christopher Coyne, Esq.

cc. Ryan Sestack Esq. (via email & ECF)
Jeffrey Camhi, Esq. (via email & ECF)
Elizabeth Shieldkret, Esq. (via ECF)